## Supporting Statement for Information Collection Requirements contained in 50 CFR 13.11-12 General License\Permit Application Form

## A. Justification

The following information is provided as part of a request to renew the Office of Management and Budget's approval for information collection pursuant to regulations that implement General Permit Procedures. These information collection requirements are contained in applications for permits that are specifically provided for in 50 CFR 13.11-12. The application form for this activity was assigned number 3-200-1.

- 1. All of the Laws, Treaties and Regulations administered by the Fish and Wildlife Service (Service) which authorize activities for which a permit is required, authorize such permits in 50 CFR Part 13 (General Permit Requirements). The requirements in 50 CFR Part 13 are in addition to any other permit regulations that may apply to a specific circumstance and are outlined in other sections of regulation. While most specific permit applications are authorized under the various 3-200 application series, the 3-200-1 General Permit/License Application gives the ability for subjects to apply for a type of permit that has not previously been specifically authorized. This allows the Service to have a general permit/license application available to meet the requirement of 50 CFR 13.4, whereby the Director of the Service may approve variations from the requirements of 50 CFR Part 13. The appropriate sections of the laws and the implementing regulations mandating or authorizing the collection of information are attached.
- 2. The collection of information for permits is achieved by using the Service's Application form 3-200-1. The Service uses this information to adequately identify permit applicants to ensure eligibility of applicant for the proposed activity as well as to maintain accurate records and communicate efficiently with permittees.
- 3. To date, the electronic submission of the application is not possible. The Service must receive an originally signed application form. Facsimile and e-mailed signatures are not accepted. Currently, applicants may submit any supporting documentation or information missing from the application, other than an original signature, via facsimile transmission. Applications may obtain an application packet via the fax-back system. Applications are also available through the Internet. We expect that as technology advances, we will be able to accept electronic submissions of applications. Therefore, we changed the format of page 1 of the application form so that the information fields on the form correspond to the data fields in our service-wide permit issuance and tracking computer system. Once the form is approved, it will be posted on the Internet in a format that will allow the public to complete the form on-line and print the completed form for signature and submission.

- 4. No duplicate information is collected elsewhere in the Service that could be used to decide whether a General permit can be issued. No other Federal agency collects this type of information except general information requirements such as name, address, etc.
- 5. No small businesses are affected by this collection of information since most often these specialized permits would be issued to individuals.
- 6. The consequence of not collecting the information contained in this application form is that the applicant would not be issued a permit since the collected information is either required on the permit itself or needed to make the necessary findings under applicable laws and regulations. Consequently, without a permit, the activity in question would be prohibited.
- 7. It is not anticipated that a respondent would have to address any of the information collection methods or circumstances described in this justification instruction.
- 8. Attached is a copy of the Federal Register notice of November 29, 2000 (65 FR 30246) documenting the Service's notice soliciting comments on the information collection prior to submission to OMB. The Service's Information Collection Clearance Officer indicates that no comments were received regarding the general License/Permit Application form in response to this notice. Opportunities for informal public comment are also available through extensive personal contact with applicants and during annual permit workshops conducted at national conferences for various types of potential applicants (e.g. zoos, hunters of trophy animals, reptile breeders, etc.). The Service also continuously internally evaluates the effectiveness of its applications as they relate to regulations for permits.
- 9. There is no provision within the General Permit Procedures regulation (50 CFR 13) to provide any gift or payment to respondents.
- 10. Information collected on permit applications is subject to the Privacy Act and Freedom of Information Act guidelines. All applicants are provided information explaining the requirements of both Acts.
- 11. None of the information collected on this application form is of a sensitive nature.
- 12. Because the 3-200-1 is a general permit application form and is only used in certain specialized circumstances, it is estimated that only approximately 4 applicants will apply for a General License/Permit annually. The frequency of response is on occasion. It will take an average of ten minutes (.16 hours) for a respondent to complete the application form. The hourly cost to an individual is assumed to be \$10.00 per hour for a Total Annual Burden of \$40.00.
- 13. The annual non-hour dollar burden to the respondents is approximately \$100 (4 applicants multiplied by the \$25.00 application fee).

Type of Information	Number of Respondents	Number of Responses	Average Time Required per response	Total Annual Burden Hours	Total Annual Non-Hour Dollar Burden
General License/Permit	4	4	.16 hour (10 min.)	.64	\$100

- 14. The annualized cost to the Federal Government is estimated to be approximately \$120 or less. This value is based on the average salary per hour of Service personnel likely to be involved in the processing/review of this application and annual report (\$20), plus operational expenses per hour (\$10), multiplied by the number of hours required to process an application (1), multiplied by the total number of responses (4).
- 15. The decrease in Total Annual Burden hours (4336.36 decrease) and total annual non-hour dollar burden resulted from a decrease in the number of applicants using the 3-200-1 application form. During the previous OMB authorization, the 3-200-1 was considered a part of all 3-200 application forms. This is no longer the case, as each complete 3-200 application is it's own form and the 3-200-1 stands on it's own. For this reason, there was a substantial decrease in the Total Annual Burden hours.
- 16. There are no plans for publication of the results of this information collection.
- 17. The Service is not seeking approval to not display the expiration date for OMB approval.
- 18. There are no exceptions to the certification statement contained in Item 19 of OMB Form 83-I for the information being collected by this application form.
- B. This information collection was designed to conform to the requirements of § 9(f) of ESA, 16 U.S.C. 1538(f). The collection of this information does not employ statistical methods.